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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
GREAT FALLS DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

NATALEE CHRISTINE CRUMLEY,  
Defendant.

**Case No. CR-17-03-GF-BMM**

**MEMORANDUM IN AID OF  
SENTENCING**

[SENTENCING DATE: JULY 25, 2017]

COMES NOW, Defendant, Natalee Christine Crumley, by and through her Counsel of record R. Henry Branom Jr., Assistant Federal Defender and the Federal Defenders of Montana, and hereby submits this Memorandum in Aid of Sentencing.

**1. Introduction**

Ms. Crumley entered a guilty plea to wire fraud, in violation of 18 U.S.C. § 1343 and aggravated identity theft, in violation of 18 U.S.C. § 1028A(a)(1), and

engaging in monetary transactions in property derived from specified unlawful activity 18 U.S.C. § 1957 as charged in the Indictment in this case. The plea was made without a formal Plea Agreement. Ms. Crumley has no objections to the advisory guideline range contained in the Pre-Sentence Report (PSR). Ms. Crumley submits that a sentence of 24 months and one day will comport with 18 U.S.C. § 3553(a).

## **2. The Sentencing Mandate**

As the Court is well versed in the case law governing sentencing the defendant will not address it here. The overarching sentencing mandate is the congressional command that the Court “shall” impose a sentence that is sufficient “to comply with the purposes set forth” in the Sentencing Reform Act. Those purposes, discussed more fully below, suggest that a sentence of 24 months and one day will comport with 18 U.S.C. § 3553(a).

### **A. Reflect Seriousness of the Offense, Promote Respect for the Law, and Provide Just Punishment**

Ms. Crumley recognizes the seriousness of the offense of conviction. She fully realizes the harm she has caused to the businesses that trusted her with their finances. She has ruined her career potential. Unfortunately, Ms. Crumley was influenced by an abusive relationship to engage in the offense conduct. A sentence of 24 months and one day will properly reflect the seriousness of the offense, promote respect for

the law and provide just punishment for the offense.

**B. Deterrence**

Ms. Crumley has clearly been deterred. She has excelled in her current employment. This is her only contact with the criminal justice system. Any term of custody beyond 24 months and one day will in no way serve to further deter Ms. Crumley or others.

**C. Protect the Public from Further Crimes of the Defendant**

The public will be protected from further crimes by Ms. Crumley. She is in no way a threat to the public. The offense conduct is not capable of repetition as Ms. Crumley will most likely never be in a fiduciary position again. The offense conduct was aberrant behavior for Ms. Crumley. Ms. Crumley has strong family support which will further promote deterrence. Continued mental health treatment will also serve as a deterrent. Ms. Crumley will not be a danger to the public, which will be protected by a sentence of 24 months and one day.

**D. Provide the Defendant with Needed Educational or Vocational Training, Medical Care, or Other Correctional Treatment in the Most Effective Manner**

Ms. Crumley has mental health needs which must be addressed. (See ¶¶ 57-61)

**3. Conclusion**

Pursuant to statute Ms. Crumley must serve a 24 month custodial sentence.

No §3553 factor will be furthered by a custodial sentence in excess of 24 months and one day. Such a sentence is sufficient but not greater than necessary.

WHEREFORE, for the foregoing reasons a sentence of 24 months and one day comports with 18 U.S.C. §3553 for a person with Ms. Crumley's history and characteristics.

RESPECTFULLY SUBMITTED this 17th day of July, 2017.

/s/ R. Henry Branom Jr.

**CERTIFICATE OF SERVICE**  
**L.R. 5.2(b)**

I hereby certify that on July 17, 2017, a copy of the foregoing document was served on the following persons by the following means:

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1. CLERK, UNITED STATES DISTRICT COURT
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Counsel for the United States of America
3. NATALEE CHRISTINE CRUMLEY  
Defendant
4. ROBERT W. WARNEKE  
United States Probation Officer

/s/ R. Henry Branom Jr.